

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

KAREN S. ROWLAND,

Plaintiff,

v.

Civil Action No. 3:23-cv-00258-MHL

TRANSWORLD SYSTEMS, INC., *et al.*,

Defendants.

**NATIONAL COLLEGIATE STUDENT LOAN TRUST DEFENDANTS’
MOTION TO DISMISS**

Defendants National Collegiate Student Loan Trust 2006-4 and National Collegiate Student Loan Trust 2007-4 (collectively, the “Trusts”), by counsel and pursuant to Federal Rule of Civil Procedure 12(b)(6), respectfully move this Court to dismiss Plaintiff’s Amended Class Action Complaint [Dkt. No. 10] with prejudice. The reasons for this Motion are set forth in the memorandum contemporaneously filed herewith.

WHEREFORE, the Trusts respectfully request that the Court enter an order: (1) granting the Trusts’ Motion to Dismiss; (2) dismissing Plaintiff’s claims with prejudice for failure to state a claim for relief under Fed. R. Civ. P. 12(b)(6); and (3) granting such further relief as the Court deems appropriate.

Dated: September 8, 2023

**NATIONAL COLLEGIATE STUDENT LOAN
TRUST 2006-4 AND NATIONAL
COLLEGIATE STUDENT LOAN TRUST
2007-4**

By: /s/ Timothy J. St. George

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CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of September 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will then send a notification of such filing (NEF) to all counsel of record.

/s/ Timothy J. St. George

Timothy J. St. George

Virginia State Bar No. 77349

Counsel for Defendants

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